

Filed Session of June 20, 2006
Approved as Recommended
and so Ordered
by the Commission

JACLYN A. BRILLING
Secretary

Commissioner Harris, abstaining

Issued and Effective June 26, 2006

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

May 25, 2006

TO: THE COMMISSION

FROM: CWG STAFF TEAM – Office of Telecommunications, Office of
Regulatory Economics, Office of Accounting and Finance, Office of
General Counsel

SUBJECT: CASE 97-C-0139 – Proceeding on Motion of the Commission to Review
Service Quality Standards for Telephone Companies.

SUMMARY OF

RECOMMENDATION: It is recommended that the Commission approve proposed
modifications to the Inter-Carrier Service Quality Guidelines.

BACKGROUND

The Inter-Carrier Service Quality Guidelines (C2C Guidelines) is a comprehensive document that establishes standards and metrics for the purpose of measuring and reporting inter-carrier service quality performance. Since the adoption of the C2C Guidelines,¹ the Carrier Working Group (CWG), whose active membership includes Department staff and the major incumbent and competitive local exchange

¹ Case 99-C-0139, Order Adopting Inter-carrier Service Quality Guidelines, issued February 16, 1999.

carriers operating in New York State, has continued to work in a collaborative manner to propose modifications to the C2C Guidelines. The recommendations of the CWG have been the subject of several previous Commission orders in this proceeding.

In this instance the CWG proposes modifications that are administrative in nature (including the incorporation of audit results from other state C2C proceedings) and the modification of Verizon New York Inc. (Verizon) retail reporting data to include transactions of Verizon's MCI affiliate, now called Verizon Business. These modifications are the result of several collaborative sessions where the CWG reviewed and agreed unanimously to the proposed changes.

Notice of the Commission's intent to modify the C2C Guidelines was provided in SAPA 97C0139SA25, and published in the State Register on April 5, 2006. No comments in response to the notice was received.

DISCUSSION

The proposed modifications to the C2C Guidelines, included as Attachment 1, are classified into two categories: non-process changes of an administrative nature; and, changes that affect a C2C Guideline process.

Administrative modifications to the C2C Guidelines, detailed in Section A of Attachment 1, clarify or correct minor clerical errors within the C2C Guidelines. Some of the proposed administrative changes include recommendations of the CWG's Joint Subcommittee to incorporate audit findings from other state C2C proceedings.²

In Section B of Attachment 1, the CWG also recommends a process modification to include transactions for the former MCI affiliate in Verizon's reported retail data. Last year the Commission approved the acquisition of MCI by Verizon.³

² The CWG formed a Joint Subcommittee (JSC) in 2004 to make recommendations to the CWG on modifications that incorporate applicable audit results from proceedings by the Pennsylvania, New Jersey and Virginia Commissions. The JSC has held numerous collaborative sessions since June 2004 to validate applicable findings and recommend their incorporation into the C2C Guidelines.

³ Case 05-C-0237, Order Asserting Jurisdiction and Approving Merger Subject to Conditions, issued November 22, 2005.

The order approving the merger directed the CWG to evaluate the impact on wholesale performance of including MCI's data with Verizon's retail data in the C2C reports or having MCI report its data separately.⁴ At its March 16, 2006 meeting, the CWG reached consensus on a proposal to exclude transactions of the MCI affiliate from aggregate wholesale data and not report such data separately, but to include transactions of the former MCI in Verizon's reported retail data. Verizon affiliate data reporting (including the transactions of Verizon's retail data service provider, Data Services Network Operations, formerly known as VADI) is always excluded from CLEC aggregate data for all metrics in the C2C guidelines.

The modifications proposed here, which represent the consensus recommendation of the CWG, are reasonable and help clarify the C2C Guidelines and enhance the efficient measurement of Verizon's operational processes, and should be approved.

CONCLUSION

Staff recommends that the Commission approve the modifications to the Inter-Carrier Service Quality Guidelines proposed by the CWG, and included in Attachment 1, that incorporate administrative changes and the modification of Verizon retail reporting data to include transactions of the Verizon Business affiliate, formerly MCI. These proposed modifications represent the consensus recommendation of the Carrier Working Group.

RECOMMENDATION

It is recommended that:

1. Proposed modifications to the Inter-Carrier Service Quality Guidelines (C2C Guidelines) that include administrative changes and the modification of Verizon New York Inc.'s retail reporting data to include transactions by its affiliate, Verizon Business, formerly MCI be approved. These proposed modifications represent the consensus recommendation of the Carrier Working Group.

⁴ Id., at 58.

2. Within 15 days of the date this Order is issued, Verizon New York Inc. should file with the Secretary (20 copies) and serve upon each party the Inter-Carrier Service Quality Guidelines with the corrections, changes and additions recommended herein.
3. This proceeding be continued.

Respectfully submitted,

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*Proposed Modifications to the C2C Guidelines – June 2006***Section A –Administrative Changes to the Guidelines**

	All Sections	
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1. Change Proposed:

Change all references from “Wholesale website” to “Partner Solutions website”

Rationale:

Verizon Wholesale is now known as Verizon Partner Solutions. Consensus 4/20/06

2. Change Proposed:

Remove all references of VADI/DSNO.

Rationale:

VADI/DSNO has been reintegrated into the retail organization. Consensus 4/20/06

	Table of Contents	
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3. Change Proposed:

Mark entries for Appendix I and J as “Reserved for Future Use” on page 10 of the December, 2005 C2C blackline document.

Rationale:

Appendix I and J were deleted from the Guidelines effective with the 12/1/05 NY PSC Order.

4. Change Proposed:

Delete the old table of contents for the Guidelines on pages 9 and 10 of the December, 2005 C2C blackline document.

Rationale:

The current table of contents on pages 2 through 7 is content-sensitive (i.e. point and click); therefore, there is no need to retain the old table of contents. Consensus 4/20/06

	Product Code List	
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5. Change Proposed:

Remove product codes not reported on the monthly C2C or associated reports

Rationale:

The product code list should contain only those products reported in the C2C or associated reports. Consensus 4/20/06

OR-2	General Exclusions Basic Edits Reject Timeliness	
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6. *Change Proposed:*
Capitalize the ‘D’ in ‘Id.’

Rationale:
Corrects the spelling. Consensus 4/20/06

	General Exclusions	
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7. *Change Proposed:*
Update PARTS acronym to read Packet at Remote Terminal Service, instead of Switching

Rationale:
Corrects the acronym. Consensus 4/20/06

8. *Change Proposed:*
Update PARTS general exclusion to exclude Provisioning orders for PARTS from the metrics.

Rationale:
Discussed in NY CWG and JSC. Verizon does not include PARTS orders in the Carrier-to-Carrier Guidelines.

9. *Change Proposed:*
Add the following general exclusion to the Guidelines.

“Orders for UNE Port service (not to be confused with Local Number Portability (LNP)), are excluded from the Provisioning metrics.”

Rationale:
Resolves JSC finding PG4.2 (MD 49.2, DC 50.2, VA 50.2). Consensus reached on 12/16/05.
NY CWG Consensus 4/20/06

	General Notes	
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10. *Change Proposed:*

Add note to the Guidelines as follows:

“Effective with the April, 2006 data month, UNE Platform arrangements that have not been migrated to other services will be counted as Resale.”

Rationale:

Discussed at the February, 2006 NY CWG meeting, clarifies treatment of UNE-P and Resale transactions after March 11, 2006. Consensus 4/20/06

	Retail Analog Compare Table	
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11. *Change Proposed:*

Update the Provisioning exceptions in the compare table to reflect that PR-6-01 UNE Loop New (not UNE POTS Total) has a retail compare of Retail POTS- Dispatched.

Rationale:

Hot cuts were removed from the PR-6-01 UNE POTS Total measure effective with the 12/16/04 NY PSC order¹. As a result, this metric changed from UNE POTS Total (with hot cuts) to UNE Loop New (without hot cuts). The retail compare was not changed in the order.

This clarification extends the PR-6-01 UNE metric change through to the Retail Analog compare table. Consensus 4/20/06

12. *Change Proposed:*

Update the Maintenance exceptions in the compare table as follows:

Exceptions for Maintenance <u>MR-2, MR-3, MR-4</u> <u>MR 4-07 and MR 4-08</u>	UNE POTS Loop UNE 2-Wire Digital Loop UNE 2-Wire xDSL Loop	Retail POTS – Total & Retail POTS – Total plus ISDN BRI (Total Loop and CO Frame/Wiring troubles) Note: excludes translation and switch troubles
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Rationale:

Effective with the 8/27/04 NY PSC order², the exclusion for translation and switch troubles was extended to cover the retail compares for MR-2, MR-3, and MR-4 for UNE

¹ Case 97-C-0139, Order Establishing Modifications to the Inter-Carrier Service Quality Guidelines for Hot Cut Measurements and Standards, issued December 16, 2004, page 10.

² Case 97-C-0139, Order Establishing Modifications to the Inter-Carrier Service Quality Guidelines for Hot Cut Measurements and Standards, issued August 27, 2004, page 13.

Proposed Modifications to the C2C Guidelines – June 2006

POTS Loop, UNE 2-Wire Digital Loop, and UNE 2-Wire xDSL Loop. This clarification extends the metric change through to the Retail Analog compare table. Consensus 4/20/06

PO-2	OSS Interface Availability	
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13. *Change Proposed:*

Update language as follows:

Geography:

All interfaces except WPTS:

- NY, CT (Combined)
- MA, VT, RI, NH, ME (Combined)
- PA, DE (Combined)
- NJ
- MD, DC, VA, WV (Combined)

PO-2	OSS Interface Availability (cont.)	
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Rationale:

States should indicate combined to reflect combined reporting. Consensus 4/20/06

PO-3	Contact Center Availability	
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14. *Change Proposed:*

Remove extra period (.) from the first sentence of the definition.

Rationale:

Corrects punctuation. Consensus 4/20/06

PO-4	Timeliness of Change Management Notice	
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15. *Change Proposed:*

Add a comma to the first sentence before the word “sent”.

Rationale:

Corrects punctuation. Consensus 4/20/06

16. *Change Proposed:*

Update language as follows.

Geography:

- Verizon North: NY, CT, MA, NH, RI, VT, ME (Combined)
- Verizon Mid-Atlantic: PA, DE, NJ, DC, MD, VA, WV (Combined)

Rationale:

States should indicate combined to reflect combined reporting. Consensus 4/20/06

PO-5	Percent On Time Notice of Interface Outage	
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17. Change Proposed:

Update language as follows:

“Detailed information on network outages can also be found on the Verizon Partner Solutions website~~in the CLEC Handbook~~.”

Rationale:

The CLEC Handbook was retired, and its contents placed on the Verizon Partner Solutions website. Consensus 4/20/06

PO-6	Software Validation	
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18. Change Proposed:

Update language as follows.

Geography:

- Verizon North: NY, CT, MA, NH, RI, VT, ME [Combined]

Rationale:

States should indicate combined to reflect combined reporting. Consensus 4/20/06

PO-7	Software Problem Resolution Timeliness	
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19. Change Proposed:

Update language as follows.

Geography:

PO-7-04:

- Verizon North: NY, CT, MA, NH, RI, VT, ME [Combined]

Rationale:

States should indicate combined to reflect combined reporting. Consensus 4/20/06

20. Change Proposed:

Update language in the example (Performance Standard section) as follows:

Note: The data value populated on the C2C report for PO-7-02, 7-03 and 7-04 represents the number of hours (or days) beyond the standard. For example, a 50 hour ~~delay~~ resolution for metric PO-7-02 and 7-04 would have a two (2) hour delay populated in the performance column to indicate the performance was two hours beyond the 48 hour standard.

*Proposed Modifications to the C2C Guidelines – June 2006**Rationale:*

The 50 hours refers to the total resolution time, not the delay time (2 hours). Consensus 4/20/06

PO-8 OR-7	Manual Loop Qualification % Order Confirmation/Rejects Sent Within Three (3) Business Days	
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21. Change Proposed:

Update exclusion language as follows:

- Test CLEC ~~ids~~ IDs

Rationale:

The 'D' in 'IDs' should be capitalized. Consensus 4/20/06

OR-1 OR-2	Order Confirmation Timeliness Reject Timeliness	
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22. Change Proposed:

Add the following note for OR-1 and OR-2 as follows:

OR-1: "Flow Through Orders are received electronically through the ordering interface and are entered into SOP and confirmed with no manual intervention."

OR-2: "For OR-2, Flow Through Orders are received electronically through the ordering interface and are rejected or queried back with no manual intervention."

Rationale:

The term Flow Through is currently limited to confirmed orders. This language clarifies that there are automated rejected orders. Consensus 4/20/06

23. Change Proposed:

Clarify the SOP downtime exclusion to specify the third weekend late start applies to NY/NE only. Proposed language in redline:

Exception: ~~The 3rd Saturday of each month is a scheduled release. SOP will have a late start the following Sunday at 9:00AM. Additionally, SOP downtime may be extended for significant SOP releases, (e.g. NPA splits). All downtime extensions will be communicated to CLECs in advance of the release through VZ Change Management Guidelines. For NY/NE, the 3rd Saturday of each month is a scheduled release. SOP will have a late start the following Sunday at 9:00AM.~~

Rationale:

With the adoption of a single regional document for the Guidelines, it is appropriate to clarify the late start on the third weekend applies only to NY/NE. Consensus 4/20/06

OR-5	Percent Flow-Through	
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24. Change Proposed:

Update the product descriptions for UNE POTS Loop and UNE POTS Other to ensure consistency throughout the Carrier-to-Carrier Guidelines. The metrics affected include OR-5-01 for UNE POTS Loop and UNE POTS Other, and OR-5-03 for UNE POTS Loop and UNE POTS Other.

Rationale:

‘POTS’ was removed from the product description to be consistent with the products as written by the PSC in their 12/16/04 order. However, these product descriptions are now inconsistent with the other references to UNE POTS Loop and UNE POTS Other in the Guidelines. No change to how the metric is calculated. Consensus 4/20/06

PR-1	Average Interval Offered	
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25. Change Proposed:

Update language in the performance standard as follows:

“The published interval for one (1) to five (5) xDSL Loops is six (6) business days (pre-qualified). ~~Refer to~~ Refer to the URL matrix at the beginning of the guidelines to obtain the specific URLs for Resale, UNE, and Collocation product interval guides.”

Rationale:

Clarification. Consensus 4/20/06

PR-1 PR-3	Average Interval Offered Completed within Specified Number of Days (1-5 Lines)	
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26. Change Proposed:

Update language for X appointment code exclusion as follows:

“Orders with the X appointment code. The X appointment code is used for customer requested or negotiated intervals beyond the standard appointment interval.”

Rationale:

Resolves JSC finding PG4.1 (MD 49.1, DC 50.1, VA 50.1). Consensus reached on 11/18/05.
NY CWG Consensus 4/20/06

27. Change Proposed:

Update language for loop qualification exclusion as follows:

“Orders where the CLEC requested a manual loop qualification (does not apply to disconnect orders).”

*Proposed Modifications to the C2C Guidelines – June 2006**Rationale:*

Resolves JSC finding PG4.3 (MD 49.3, DC 50.3, VA 50.3) and PG4.6 (MD 49.6, DC 50.6, VA 50.6). Consensus reached on 12/1/05. NY CWG Consensus 4/20/06

PR-3	Completed within Specified Number of Days (1-5 Lines)	
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28. Change Proposed:

Clarify exclusion for coordinated conversions as follows:

“Coordinated cut-over Unbundled Network Elements such as loops or number portability orders (This exclusion applies to all PR-3 sub-metrics except PR-3-08 ~~UNE Basic Hot Cut Loops (1-10 lines)~~, PR-3-11, PR-3-12, and PR-3-13).”

Rationale:

JSC Consensus 2/28/06. The only product measured in PR-3-08 is UNE Basic Hot Cut Loops, so there is no need to specify the PR-3-08 product when the metric number alone will suffice.

Also, PR-3-11, PR-3-12 and PR-3-13 were introduced in the 12/16/04 NY PSC order as metrics that measure coordinated conversions. As such, they are subject to the existing coordinated cutover exclusion in PR-3.

NY CWG Consensus 4/20/06

PR-4	Missed Appointments	
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29. Change Proposed:

Clarify exclusion language as follows:

“Disconnect orders (does not apply to PR-4-07)”

Rationale:

JSC Consensus 2/28/06. Resolves audit finding PG14.5 (MD 58.5, DC 59.5, VA 60.5).

NY CWG Consensus 4/20/06

PR-4	Missed Appointments	
PR-8	Percent Open Orders in a Hold Status	

30. Change Proposed:

Update the products as listed in the Carrier-to-Carrier Guidelines and the accompanying product codes on the Carrier-to-Carrier reports

UNE POTS to UNE POTS - Loop

Proposed Modifications to the C2C Guidelines – June 2006

The metrics affected are as follows:

PR-4-02-3100 to PR-4-02-3112

PR-4-03-3100 to PR-4-03-3112

PR-8-01-3100 to PR-8-01-3112

PR-8-02-3100 to PR-8-02-3112

Rationale:

UNE Platform will be removed from the Carrier-to-Carrier Guidelines when the 12/1/05 NY PSC order is implemented. As such, the UNE POTS product (Platform + Loop) will only measure Loop products. Consensus 4/20/06

MR-2	Trouble Report Rate	
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31. Change Proposed:

Update the language in the Definition Section as follows:

“The Disposition Codes ~~set forth in the CLEC Handbook, Vol. III Section 8~~ can be found on the Verizon ~~wholesale~~ Partner Solutions web-site. Refer to the URL matrix at the beginning of the C2C guidelines for the URL to find disposition codes in effect at the time of the compliance filing.

Rationale:

The CLEC Handbook has been retired, and its content has been moved to other locations on the Verizon Partner Solutions website specified in the URL matrix. (Please note the URL matrix is outdated as reported by Verizon during the December, 2005 commission order cycle.) Consensus 4/20/06

MR-4	Trouble Duration Intervals	
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32. Change Proposed:

Restore the UNE 2-Wire xDSL Loop product to the third paragraph (definition of limited stop clock):

Rationale:

Trouble duration intervals for UNE 2-Wire xDSL Loop are still measured on a limited stop clock basis. This product was removed in error from the 12/16/05 compliance filing. NY CWG Consensus 4/20/06

NP-1	Percent Final Trunk Group Blockage	
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33. Change Proposed:

Remove the following language from the performance standard section.

End User Standard [Applicable to New York only]:

602.1(m) Final Trunk Group - The last choice group of common interoffice communications channels for the routing of local, operator and/or toll calls.

603.3(g) Percent Final Trunk Group Blockages. This metric is defined as the monthly percentage of blocked calls on any local, toll, and local operator final trunk groups and has a performance threshold of 3.0% or less for each final trunk group.

603.4(d)(3) For Percent Final Trunk Group Blockages, a Service Inquiry Report shall automatically be filed whenever performance is not at or better than 3.0 percent for three consecutive months.

Rationale:

The language is derived from the NY PSCs 1996 Competition II order on service quality, as amended in 2000. The language pertains to traffic (including local operator final trunk groups) that is not measured under NP-1. The NP-1 metric measures dedicated one-way Final Trunk Groups carrying traffic from Verizon's tandem to the CLEC. Consensus 4/20/06

34. *Change Proposed:*

Update definition language as follows:

~~[Tables specify the blocking threshold (Service Threshold) under which Verizon operates, above which it is statistically probable that the design blocking standard is not being met and the trunk group requires servicing action. For B.005 design, this is trunk groups exceeding a threshold of about 2% blocking.]~~

[Verizon uses blocking threshold tables (Service Threshold) to determine the statistical probability that the design blocking standard is not being met; with the resulting trunk group requiring service action. For the NP-1 metrics, trunk groups exceeding a 2% threshold require action to prevent future blocking.]

Rationale:

Clarifies the existing language, the B.005 design standard is native to Telcordia specifications.

Consensus 4/20/06

NP-2	Collocation Performance	
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35. *Change Proposed:*

Update NP-2 formula language as follows:

Interval: (~~Completed arrangement~~ Completion Date minus the Application Date (adjusted for milestone misses)) divided by the Number of Arrangements Completed.

% On Time: (Number of Arrangements completed on or before DD (adjusted for milestone misses) divided by Number of Arrangements completed) multiplied by 100.

Delay Days: (Actual Completion Date minus the Committed DD (adjusted for milestone misses) for arrangements where the DD was missed) divided by the Number of Arrangements where DD is missed.

Milestone misses: The Milestone timeline is attached in ~~the~~ Appendix P.

Rationale:

The interval formula as modified shows completion dates instead of completed arrangements to better reflect how the metric is calculated. The formula should also carry language for milestone misses.

The percent on time formula as modified shows that arrangements completed before the due date are included in the calculation.

The delay days formula as modified shows that the formula applies only to arrangements that were not completed on time.

The milestone misses formula was modified for grammar.

Consensus 4/20/06

36. Change Proposed:

Update the numerator language for the Average Delay Days metrics (NP-2-07 and NP-2-08) to remove the word ‘due’ from ‘Collocation arrangement completion ~~due~~ date’:

Rationale:

The NP-2-07 and NP-2-08 numerators measure the sum of duration between actual Collocation arrangement completion dates and the due dates for missed Collocation arrangements. Consensus 4/20/06

OD-1	Operator Services/Directory Assistance – Speed of Answer	
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37. Change Proposed:

Remove the word “company” in the OD-1-01 report dimension. Insert a bullet against the second report dimension of OD-1-02 as follows:

For metric OD-1-01 Operator Services – Speed of Answer
~~Company:~~

- State Specific Retail/Resale combined
- State Specific CLEC (facility based)

For metric OD-1-02 Directory Assistance – Speed of Answer

- State Specific Retail/Resale combined
- State or regional Specific Operator Service Centers

Rationale:

The word “company” is not relevant to the report dimension. The additional bullet improves formatting. Consensus 4/20/06

Glossary	Collocation Milestones	
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38. *Change Proposed:*

Update language as follows:

“Prior to the CLEC beginning the installation of its equipment, the CLEC must sign the VZ work completion notice, indicating acceptance of the multiplexing node construction work and providing VZ with a security fee, if required, as set forth on the Verizon Partner Solutions website in Section 5.5.5...”

Rationale:

The CLEC Handbook was retired, and its contents placed on the Verizon Partner Solutions website. Consensus 4/20/06

Appx F	E911 Updates	
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39. *Change Proposed:*

Update language as follows:

“The responsibilities and procedures for updating the E911 database are described on the Verizon Partner Solutions website in VZ's CLEC Handbook and E911 PS/ALI Guide. ~~Both documents are available to the public at VZ's website.~~”

Rationale:

The CLEC Handbook was retired, and its contents placed on the Verizon Partner Solutions website. Consensus 4/20/06

Appx G	Repair Disposition Codes	
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40. *Change Proposed:*

Update language as follows:

“All repair codes can be found on the Verizon Partner Solutions website in the CLEC Handbook, Volume 3, and Section 8”

“~~8.8~~ (Repair) Disposition Codes”

“~~8.8.1~~ Disposition Codes North”

“~~8.9.1~~ Cause Code Table – North”

“~~8.7.2~~ Disposition Codes South...”

“~~8.8.2~~ Cause Code Table – South...”

Rationale:

The CLEC Handbook was retired, and its contents placed on the Verizon Partner Solutions website. Consensus 4/20/06

Glossary	Retail Analog Compare Table PR -1 Average Interval Offered	
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41. *Change Proposed:*

- a. Remove references to POTS - Total (All) in the Retail Analog compare table for Provisioning and Maintenance, as well as the Glossary.
- b. Add exceptions to the Retail Analog table for PR-1-12 Resale POTS/Complex and UNE POTS/Complex. Note: Resale Complex does not include 2-Wire xDSL Loops.
- c. Clarify that the Maintenance retail compare for UNE 2-Wire Digital and xDSL is Retail POTS – Total plus ISDN BRI

Rationale:

- a. The use of both Retail POTS – Total (All) and Retail POTS – Total in the Guidelines is confusing.
- b. POTS- Total plus Complex (formerly POTS Total – All) is used for provisioning only as the Retail compare for PR-1-12; therefore, it should be placed in the exception section of the Retail Analog table.
- c. This information was previously in a footnote; it makes sense to include this in the body of the table instead.

Summary

	Provisioning	Maintenance
Retail POTS Total	Yes	Yes
Retail POTS Total plus Complex	Yes (PR-1-12)	No
Retail POTS Total plus ISDN BRI	No	Yes (UNE Digital & xDSL Loop)

Consensus 4/20/06

Appx P	Collocation 45 Day Augment Milestone Chart	
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42. Change Proposed:

Restore header and footer from the previously approved Appendix P (2004).

Header: Collocation Interval Timeline November 2004

Footer: This document is intended to be a reference and may not reflect the most recent information in the tariff.

Rationale:

The header and footer for Appendix P were truncated with the migration to a combined set of Carrier-to-Carrier Appendices. Consensus 4/20/06

Section B: Modifications Requiring Process Changes

	Retail Analog Compare Table	
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43. Change Proposed:

Add a footnote against 'Retail' in the compare table as follows:

“Transactions provided to the former MCI entities are included in Retail.”

Rationale:

The NY CWG reached consensus in March, 2006 to count transactions for the MCI affiliate in Retail.